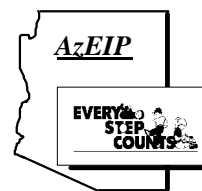


Chapter 2



MONITORING

Arizona Early Intervention Program

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2.0.0 Continuous Monitoring and Quality Improvement System**2.1.0 Authority:** 20 U.S.C. 1435(a)(10)(A); 34 C.F.R. 303.501**2.2.0 Introduction**

The purpose of the Continuous Monitoring and Quality Improvement System is to improve experiences and outcomes for families using a comprehensive, coordinated, interagency monitoring system that takes a multi-faceted approach to improving both compliance and program performance through direct linkages between monitoring and technical assistance systems. AzEIP is responsible for general supervision and monitoring of agencies and providers in the Arizona Early Intervention Program and works with them to correct identified deficiencies.

2.3.0 Policy

1. The purpose of all monitoring activities is to identify areas of compliance and noncompliance, correct identified noncompliance with IDEA, Part C requirements and AzEIP policies and procedures, develop corrective action and program improvement plans, and ensure that identified noncompliance is corrected as soon as possible, but no later than one year from the time of identification.
2. Arizona's Continuous Monitoring and Quality Improvement System provides agencies and programs with support offered through its Technical Assistance System. Support is also available throughout the monitoring process to aid in each program's Program Self-Assessments (PSA), preparation for on-site monitoring visits, the development and implementation of corrective action and/or program improvement plans, and demonstration/documentation of compliance.
3. The monitoring system focuses on five cluster areas and performance indicators:
 - A. general supervision;
 - B. child find and public awareness;
 - C. early intervention services in natural environments;
 - D. transition; and
 - E. personnel.

These cluster areas align with the current monitoring priorities and indicators of the United States Department of Education, Office of Special Education Programs, and may change over time.

4. As family-centered principles and practices are embedded in early intervention, they are measured throughout the cluster areas and performance indicators.
5. The monitoring system includes the following components:
 - A. Family surveys;
 - B. Program Self-Assessments;
 - C. Periodic desk audits by AzEIP (which review local and statewide data from multiple data sources, including automated data systems, family complaints or grievances, and regular programmatic and financial reports);

- D. Cyclical site reviews and/or focused monitoring reviews;
 - E. Corrective Action and/or Improvement Plans; and
 - F. Technical Assistance.
- 6. In the cycle or year that the agency or provider/contractor receives an on-site visit, the corrective action/continuous improvement plan will be revised to include results from the PSA and findings from the site visit into a single plan.
 - 7. The Intergovernmental Agreement, required under A.R.S. §8-652 to implement AzEIP, which includes the AzEIP service providing agencies, ensures corrective action according to its terms, relevant law, and policies and procedures, to correct persistent deficiencies.

2.4.0 Procedures

2.4.1 Family Surveys

- 1. The Service Coordinator distributes the AzEIP Family Survey to families, along with a self-addressed, postage prepaid envelope, at each annual IFSP and at, or near, the family's exit from early intervention.
- 2. Families send the completed surveys directly to the AzEIP office for data input and analysis, or enter the answers via a web-based form.
- 3. Annually, AzEIP will provide each agency and qualified vendor with a summary of the family survey results for their program.
- 4. Each program will reflect the survey results in its program's self-assessment. Identified areas of potential non-compliance will be verified, and if verified, addressed in the program's corrective action plan.

2.4.2 Program Self-Assessment

- 1. Annually, AzEIP service providing agencies and contractors providing service coordination will complete (or update) the Program Self-Assessment (PSA) and submit to AzEIP and, if contracted, their contracting agency. See **Appendix A** for a copy of the PSA.
- 2. Program Self-Assessments also may provide verification of corrected areas of non-compliance and close out the outstanding corrective action plan from the previous year.
- 3. Data sources used to develop the PSA include:
 - A. family surveys and interviews, exit interviews, and community feedback
 - B. review of family complaints or grievances
 - C. child tracking data from FOCUS, ACTS-4, or other automated AzEIP approved data system
 - D. a review of 10% of randomly selected child files, at least two per service coordinator, utilizing the Child File Audit Guide (See **Appendix B** for the Child File Audit tool and Guide)
 - E. 100% personnel file review utilizing the Personnel File Audit tool (See **Appendix C** for the Personnel File Audit tool)

- F. review of policies and procedures manual, if applicable
 - G. progress toward correction of previously identified noncompliance, including implementation of previous corrective action plan
 - H. supervisory themes and discussions, such as supporting staff on writing the components of the Individualized Family Service Plan
- 4. The AzEIP service providing agencies and contractors providing service coordination will prepare and submit a corrective action plan (CAP) and/or program improvement plan outlining targets (proposed evidence of change), activities to achieve results, projected timelines (one year or shorter), available resources, and technical assistance needed to correct any areas of non-compliance, to their contracted agency, if appropriate, and to AzEIP for review and approval as part of the Program's Self-Assessment. A sample CAP is in **Appendix D**.
 - 5. Once a CAP is approved, status updates will be submitted, at specified intervals, to AzEIP, and their contracted agency, if required, of progress and persistent challenges in bringing their program into compliance within one year.
 - 6. When a program has reached compliance for all items in the CAP, AzEIP issues a close out letter for the CAP.

2.4.3 Desk Audits by DES/AzEIP

- 1. AzEIP conducts a review of all existing data submitted to the AzEIP office by the AzEIP service providing agencies and contractors and analyzes the data to identify areas of strengths and areas in need of correction/improvement planning including:
 - A. review and verification of program self-assessment findings
 - B. analysis of family survey data
 - C. review and analysis of child tracking data from ACTS-4, FOCUS, or other approved data systems
 - D. review of family complaints or grievances
 - E. review of local program coordinator reports identifying trends/issues in implementing AzEIP at the local level
 - F. review of agency and/or program policies and procedures manual, if applicable
 - G. corrective action plan development or review, including progress reports
 - H. review of regular programmatic and financial reports
- 2. If areas of non-compliance are identified through the desk audits, AzEIP may:
 - A. require the program to submit further information at required intervals documenting progress or verifying that the problem has been corrected;
 - B. conduct a focused monitoring site visit to verify findings of the desk audit if needed; and
 - C. provide technical assistance to the program in analyzing the areas of non-compliance and in developing or updating a corrective action plan to bring the program into compliance within a year or less.

2.4.4. Site Reviews

1. Within the stipulated 5 year monitoring cycle, AzEIP conducts comprehensive site monitoring of programs. See **Appendix E** for the statewide cycles for monitoring visits.
2. Site reviews may occur outside of the monitoring cycle (“focused monitoring”) if deemed necessary to investigate a system complaint or information indicating a serious issue in regard to service delivery and/or program and fiscal management.
3. For site visits scheduled within the monitoring cycle, monitoring teams are formed to participate in the monitoring. Those teams include:
 - A. A State Agency Team (SAT) comprised of AzEIP staff and state level AzEIP service providing agency representatives, when appropriate. The SAT is individually designed depending on the program being monitored and the contracts held with the AzEIP service providing agencies. The SAT is responsible for:
 - (1) reviewing program self-assessments;
 - (2) review of policies and procedures, if applicable;
 - (3) conducting site or focused monitoring reviews (including the training for the Local Agency Team on the monitoring process and instruments);
 - (4) approving and monitoring corrective action plans; and
 - (5) verifying program compliance.
 - B. A Local Agency Team (LAT) put together by the agency or contractor being monitored may consist of program administrators, supervisors, service coordinators, contracted service providers, and family members. The number of members on the LAT depends on the number of children and families served by the program being reviewed. The LAT is responsible for:
 - (1) participating in the site review by attending the entrance meeting;
 - (2) conducting child and personnel file audits with the SAT;
 - (3) setting up home visit observations for the SAT members; and
 - (4) participating in the corrective action/improvement planning process, when indicated.
 - C. The procedures for scheduling a site visit within the monitoring cycle are:
 - (1) Approximately two months prior to the scheduled review, DES/AzEIP sends notification in writing of the date and time of the site visit.
 - (2) The notification will include a description of the process and a clear delineation of roles and responsibilities in preparing for and conducting the review.
 - D. During the site review:

- (1) An entrance meeting is conducted by the SAT at the beginning of each on-site monitoring visit. The SAT meets with the LAT, including administrators, supervisors, program staff, families, and others, involved in the monitoring process to review the process and tools. The program then has an opportunity to share its perceived strengths, needs, and challenges with regard to compliance and quality services.
 - (2) Members from the SAT and LAT monitor two different service coordination files per service coordinator utilizing a random file sample of children birth-1 year, 1-2 years, 2-3 years. SAT members provide specific training and technical assistance to the LAT prior to and during file reviews. The SAT and LAT review findings to identify issues and themes and determine if there is a need for further exploration. If needed, the SAT members randomly pull additional files or view all from a certain period of time or from a specific service/support coordinator or provider.
 - (3) Members from the SAT verify at least 10% of personnel files.
 - (4) Members from the SAT complete the Physical Set-up Checklist. See **Appendix F** for a copy of the Checklist.
 - (5) Members of the SAT conduct family interviews asking questions concerning the family's experience with the early intervention program.
 - (6) Programs are asked to set up home visit observations for SAT members to observe staff performance as part of the on-site review.
 - (7) An exit conference will be conducted by the SAT with all relevant staff at the end of an on-site visit to summarize preliminary findings from all monitoring and data sources and to begin the development of a corrective action plan.
- E. Upon completion of an on-site monitoring review:
- (1) A draft report of findings is begun at the end of the site visit with the LAT. The completed draft is sent to the appropriate contracting agency and program representative within 30 calendar days of an on-site monitoring visit. The report outlines areas of compliance, areas that must be improved to bring the program into compliance, and recommended options to improve program performance.
 - (2) A written response must then be submitted to AzEIP within 14 calendar days of receipt indicating acceptance or disagreement with the findings, the basis of disagreement and documentation to support, and the proposed actions to correct deficiencies and provide necessary supporting documentation.
 - (3) Within 14 calendar days of receiving the response, AzEIP issues a final report to the contractor and AzEIP service providing agency, if contracted. The report includes all findings, required corrective

actions, and the program's responses to areas of noncompliance requiring corrective action.

- (4) AzEIP, in partnership with the service providing agency, as appropriate, monitors progress towards the completion of required corrective action plans and provides technical assistance when necessary. Corrective measures and remedies may be applied when a program fails to achieve acceptable performance with the necessary technical assistance and support within the timelines outlined by AzEIP.

2.4.5 Corrective Measures and Remedies

1. AzEIP ensures the enforcement of corrective measures and remedies in conjunction with the monitoring system, including:
 - A. required submission of additional documentation and/or increased frequency of reporting concerning area(s) of non-compliance and strategies to improve compliance;
 - B. focused monitoring visits to review files, meet with staff, identify strategies for improvement and prepare a plan to address areas of non-compliance;
 - C. implementing a corrective action plan, including timelines for implementation;
 - D. revising contract terms and provisions when necessary and with appropriate notice;
 - E. adjustment or withholding of whole or partial payment until satisfactory resolution of default/non-compliance;
 - F. suspending all or part of the contract; and
 - G. termination of the contract in whole in part.